

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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THE EXPORT-IMPORT BANK OF : Civil Action No: 13-cv-1450 (HB)
THE REPUBLIC OF CHINA, :
: Plaintiff/Judgment Creditor, :
: -against- :
: :
: GRENADA, :
: :
: Defendant/Judgment Debtor. :
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NOTICE OF CROSS-MOTION FOR JUDGMENT ON THE PLEADINGS

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law and all prior pleadings and papers filed in this action, Plaintiff/Judgment Creditor The Export-Import Bank of the Republic of China (“Ex-Im Bank”) will move this Court, the Honorable Harold J. Baer, United States District Judge, in the United States Courthouse, 500 Pearl Street, New York, New York, Room 23B, pursuant to Federal Rule of Civil Procedure 12(c), for an order granting judgment on the pleadings establishing Grenada’s liability for violations of the *pari passu* clauses and restrictive covenants of the Loan Agreements, as defined in the accompanying Memorandum of Law, and for such other relief as this Court deems just and proper.

Ex-Im Bank respectfully requests a hearing on the issues presented in the Motion.

Dated: New York, New York
May 9, 2013

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By: /s/ Paul E. Summit

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